

Burdett, Cheryl

From: LEPP@Agri.ohio.gov
Sent: Friday, September 09, 2016 7:12 AM
To: Schwer, Don; Channon.Cohen@epa.ohio.gov; Mark.Boden@epa.ohio.gov; William.James@epa.ohio.gov; Deborah.Strayton@epa.ohio.gov; Leonard.Powell@epa.ohio.gov; Cole.Miller@epa.ohio.gov; BEH@odh.ohio.gov; administration@agri.ohio.gov; agrdairy@agri.ohio.gov; enforcement@agri.ohio.gov; agragri@agri.ohio.gov; LEPP@Agri.ohio.gov; agrlegal@agri.ohio.gov; ruthanne.flottman@epa.ohio.gov; dnrmail@dnr.state.oh.us
Cc: Burdett, Cheryl; Robert Clendenen; Matthew.Lane@agri.ohio.gov; chad.amos@agri.ohio.gov; kirk.hines@agri.ohio.gov; Rick.Wilson@epa.ohio.gov
Subject: RE: Complaint and request for an investigation of an Animal Feeding Operation located at Exemption 6, Mount Vernon, Ohio

Good Morning,

Staff from the Knox SWCD have been out and investigating. The original complaint came it to us as an odor complaint about two months ago.

It is a small dairy and they are working with them. It is not a CAFO. I attached some of the information below...

- Owner – Exemption 6 – Exemption 6 - Exemption 6
MOUNT VERNON OH 43050
- Type - **Dairy**
- Year operation established - **1984**
- Number of cows/ave. size – **milking head, dry cows at average weight lbs., no replacement stock kept on farm.**
- Confined? & % of time – **Milking cows 100% confinement, dry cows on pasture**
- Bedding Type/Amount – **Sand-14 ton/week**
- Manure storage – **none**
- Daily haul amount - **estimated ¾ spreader full (2,400 gallons)**
- Spreader size – **3,200 gallon (slinger)**
- Spread width – **20**
- Application rate – **5,000 gallons /acre**

Kevin H. Elder, Chief
ODA-Division of Livestock Environmental Permitting
8995 East Main Street
Reynoldsburg, Ohio 43068

Phone: 614/387-0469
Cell: 614/582-7880

Fax: 614/728-6335

Web: <http://www.agri.ohio.gov/divs/DLEP/dlep.aspx>

From: Schwer, Don [mailto:Schwer.Don@epa.gov]

Sent: Thursday, September 08, 2016 5:11 PM

To: Cohen, Channon; Boden, Mark; James, William; Strayton, Deborah; Powell, Leonard; Miller, Cole; BEH; AGR-Administration; AGR-Dairy; enforcement@agri.ohio.gov; AGR-AGRI; AGR-LEPP; AGR-Legal; Flottman, Ruthanne; DNR DNRMail

Cc: Burdett, Cheryl

Subject: FW: Complaint and request for an investigation of an Animal Feeding Operation located at Exemption 6, Mount Vernon, Ohio

Hello all,

Please let me know who and how the state is following up with this. If this farm is deemed to be a CAFO or is operating under an NPDES permit please let me know whether the matter warrants federal involvement.

Thank you,

Donald R. Schwer III

Agricultural Engineer/Enforcement Officer

Environmental Protection Agency

Water Division, Water Enforcement and Compliance Assurance

U.S. EPA Region 5

Tel: (312) 353-8752

77 W. Jackson Blvd. (WC-15J)

Fax: (312) 886-6090

Chicago, IL 60604

Email: schwer.don@epa.gov

 Please consider the environment before printing this e-mail

From: Exemption 6 [mailto:Exemption 6]

Sent: Tuesday, September 06, 2016 2:27 PM

To: R5Hotline <R5Hotline@epa.gov>; info@sraproject.org; contact-us@eccscm.org; Channon.Cohen@epa.ohio.gov; Mark.Boden@epa.ohio.gov; calvin.james@epa.ohio.gov; debbie.strayton@epa.ohio.gov; leonard.powell@epa.ohio.gov; Cole.Miller@epa.ohio.gov; info@knoxhealth.com; BEH@odh.ohio.gov; administration@agri.ohio.gov; dairy@agri.ohio.gov; enforcement@agri.ohio.gov; agri@agri.ohio.gov; lepp@agri.ohio.gov; legal@agri.ohio.gov; knox@ofbf.org; ruthanne.flottman@epa.ohio.gov; dnrmail@dnr.state.oh.us

Subject: Complaint and request for an investigation of an Animal Feeding Operation located at Exemption 6, Mount Vernon, Ohio

September 3, 2016

This is a complaint and request for an investigation of an Animal Feeding Operation located at Exemption 6, Mount Vernon, Ohio. This AFO is using two fields to dump animal waste. One has been used more than once/week, sometimes multiple times/day, at times likely within 100 feet of an occupied residence, possibly within 100 feet of private wells and likely over an underground stream that makes its way to the Kokosing River. It has violated OAC 1501:15-5-05. We have also presented evidence in violation of ORC 3767.13. There may be additional violations. (NOTE: If you are reading this in a letter sent via US Postal Service, there is a website at the end with a link that can be typed into your browser URL so you can view the photographic evidence in support of this complaint.)

INTRODUCTION

We are not certain if this dairy farm is considered a small (or possibly medium) Controlled Animal Feeding Operation and so will refer to it here simply as 'AFO'. The cattle are housed

(not grazing) and the AFO also raises horses, sheep and mastiffs, which we suspect are also all housed.

Our understanding is that fertilizing a hayfield is to be done two times per year and possibly as many as four times per year, not multiple times per week, randomly and sometimes more than once per day, on wet soil and/or while the grass is nearly ready to cut for hay, throughout the year. Based upon the frequency and amount of manure spreading, there appears to be no Nutrient Management Plan nor manure storage containment system. We have included numerous photos showing the frequency of manure disposal and the supersaturation of the ground. We assume this manure-saturated grass is cut and fed to dairy cattle and other animals on the AFO, bringing the possibility of parasites.

The main field focused on in this complaint is located roughly 160 feet from, and southwest of, our residence, with the corner nearest our home seemingly used for the bulk of this manure disposal (which can be seen in the accompanying photos taken from our property over a period of weeks this summer). This field is east of the AFO and within 150 yards of at least 13 occupied residences, most of which are downwind of the field. The AFO uses two fields for manure disposal (see [Google Earth image](#)), with the other field approximately 350 yards (eastern edge-to-eastern edge) and to the west of the main field of this complaint, thus 350 yards further west (and further upwind) from residences. By way of comparison, these fields are southwest and east (thus beside and downwind) of the farmhouse on the AFO which is approximately 100 yards from the field furthest away from other residences. The farmhouse is located east of, and approximately 200 feet from, a field that is apparently on the AFO's property and that could be used by the AFO for manure storage containment or cleared to use as a hayfield, but no doubt is not because the farmhouse is downwind of that field.

When spread on the main field in this complaint, it takes several hours for the nauseous stench to clear and creates a pest problem with swarms of biting stable flies that linger. There are times when this has occurred multiple times per day (see log at conclusion of complaint).

Regarding the field we are focusing on in this complaint, it is a relative certainty that there is an underground stream directly beneath that field which flows into a stream across the highway ([Exemption 6](#) [REDACTED]). The water from that stream eventually makes its way into the Kokosing River, creating a danger of contamination of public waters.

When manure is spread on the edge of the field we are focusing on in this complaint, that area appears to be within 100 feet of an occupied residence (see [Google Earth image](#)). There were two instances of the AFO operator spreading manure less than 50 feet from people who were in plain view while the owners were entertaining guests outside their residence last year. Needless to say, they have not spent any time outdoors this summer, aside from mowing their yard.

It is also possible that manure is spread within 100 feet of wells of two occupied residences.

There have been complaints filed from more than one neighbor. There has been at least one phone call directly to the AFO to discuss this situation from our residence, resulting in denial, insults and a belligerent attitude, as well as an immediate spreading of manure within minutes of the call (see [phone call](#); see [photos of spreading done just minutes after](#)). The AFO operator's intolerance of any suggestion that there is a problem makes one wonder if the AFO is hiding something so that the AFO operator bullies neighbors into submission rather than subject his operation to scrutiny.

The stench is so bad it even permeates indoor areas. On at least one occasion last winter, it was so putrid and strong that it stunk up the residence even though no doors or windows had been open due to cold weather.

This is personally costing us money for OTC medications, but hasn't cost us doctor bills only because we have suffered through health issues that we probably shouldn't have, so we expect medical bills in the future if this AFO's practices are not stopped. It costs our family additional on the energy bill to run air conditioning when it would not normally be needed if windows could remain open. We have recently purchased water testing kits and a chemical respirator (in the event that we need to be outside after one of these all-too-frequent sewage spreadings and can't put something off for days waiting for a day without spreading, though that does nothing for the biting pests), and has resulted in an increase in grocery bills because of not being able to adequately and comfortably tend our garden. Additionally, this is certainly dropping the property values of everyone in the neighborhood.

DETAILS AND QUESTIONS

Although this AFO has been in operation for many years, this issue has only been going on for a little over a year. We are unaware of why this change occurred. We assume this is a small CAFO but it could be because the AFO has grown and not reported the increase in size, thus creating a problem in which the AFO suddenly cannot keep up and is simply hopeful that it is not investigated due to the lax regulations regarding operations not regarded as medium or large CAFOs.

A neighbor recently told us that she used to see him driving with his manure up the road to dump it. We cannot corroborate this story, but if true, it might suggest that he lost the rights to use a previous manure storage containment system and as a result has created this unhealthy and unbearable situation for the neighborhood.

It is also possible there is something being added to the feed that is creating this constant malodorous atmosphere. It certainly would be worth looking into this possibility also in case there is something being fed to the cattle that would create a possible health risk to anyone drinking milk produced on this AFO.

We recently purchased testing kits for our own water source and found it was "acceptable" regarding nitrates. In the middle of August, after having little-to-no rain for weeks, it rained for several days straight. We purchased another testing kit and went across the highway to get permission from a neighbor to test the water in their creek which it seems receives water from an underground stream beneath the field in question and eventually makes its way into the Kokosing River. Unfortunately, we did not get a water sample until days after that first substantial rain. By the time we did test it, the nitrates, while still "acceptable", appeared to be slightly higher than the water tested on this property. That suggests that it is possible that ammonium nitrate and other toxins had washed downstream after days of rain. We are not certain, however. But it seems reasonable that this issue, along with soil testing, should be watched over by governmental organizations on a regular basis to make certain this AFO is not in violation of polluting soil and water. (NOTE: While talking with this neighbor as she directed us to the stream on their property, she noted that she hadn't noticed the stench until that day. Apparently her husband prefers air conditioning and, because they are an older couple, they rarely spend time outdoors. The AFO had apparently spread earlier that day in the other field which puts this neighbor's property more in line with the air currents, making her aware of this stench, which she also admitted had never been a problem before. This is the neighbor who then told us that she believes she used to see the AFO operator driving his manure to a different site for disposal.)

COMPLAINTS AND RESULTANT ABUSIVE TREATMENT OF AND DISREGARD FOR NEIGHBORS

Prior to last summer, it was common to see and hear neighbors outdoors enjoying the weather daily, and not just those adjacent to this property; that includes those over 100 yards away that would also be within earshot. Now, aside from necessary chores, there is rarely anyone outside throughout the entire neighborhood due to the stench, resulting infestation of pests and obvious health concerns.

This field is within 150 yards of at least 13 homes, which is close enough for the malodorous atmosphere to linger for hours throughout, not to mention the multitude of biting flies that result and are a constant nuisance during summer. Of the complaints of which we are personally aware, one was from 2015 and we subsequently found that residence for the source of that complaint is roughly 150 yards from the field in question. There may have been more complaints lodged with different organizations; we are not certain.

A phone call on June 26 of this year to the AFO operator resulted in accusations that we had filed a complaint in 2015. We had not, but did later, to Knox County Soil and Water Conservation in August of 2016, who informed us of their intent to write to the AFO regarding our concerns but which unfortunately, though not surprisingly, led to no relief, but rather a seeming increase in the amount of manure dumped in the area of the field closest to our residence.

The phone call to the AFO operator (prior to lodging a formal complaint with Knox County) led to an antagonistic response to our health concerns and right to comfort on our property. He

chided the caller, my mother, saying that "city folk" just don't understand the smell of the country, then continued being belligerent even after she informed him that she grew up on a cattle farm and has never smelled anything so offensive and that, although we have been here for several years, it was only in 2015 when this problem started.

Minutes after that phone call was made, the AFO operator (who had already spread manure less than 24 hours prior) returned to the field to spread again (less than half an hour after the call was placed), apparently to show the neighborhood 'who is boss' (see photos previously linked and linked again in conclusion).

This is not the only instance of the level of outright disrespect for neighbors.

Our next-door neighbor lives in one of the closest residences to that field (the one that appears to be within 100 feet) and was subject to some particularly disturbing abuse last summer, not long after this started. On two different occasions they were entertaining guests in their back yard and they were 25-50 feet away from the edge of the field (one time playing volleyball, the other just enjoying the outdoors) when the AFO operator decided to spread a large amount of manure on the field in the corner closest to their residence (bordering this property), literally within a few yards of people rightly enjoying themselves outdoors. There was no decision either time on the part of the AFO operator to spread manure in a different location of the field nor to wait until dusk or after the weekend. Both of these instances occurred in the afternoon on either a Saturday or Sunday. Based upon the treatment of my mother on the phone and immediate spreading after that call was made this year, it makes one wonder if this spreading while our neighbors were entertaining in their yard was also done in response to the complaint lodged in 2015, which we discovered was made by a family occupying a residence 150 yards away.

It was about a month or so after our next-door neighbor had suffered deliberate spreading by the AFO in the corner of the field closest to them (twice) that we decided to log manure application times. We have a partial list; no doubt we have missed logging some instances from being out when this occurred and at times have been lax about it. Some of it is direct sighting and being alerted in advance by the tractor (which seems much quieter and therefore harder to visually catch in the field this year) while some of it is from being alerted by the stench.

This summer, we finally decided to begin taking photographs in order to use the dated metadata to prove the ludicrous frequency of this sewage disposal, thus all of the times on the photos can be proven. The Google Earth image shows how supersaturated the ground is on any given day. As you can see in the Google Earth image, because manure is spread multiple times per week over time rather than two-to-four applications per year, both fields are darker than the highway pavement and a portion (the most recent applications prior to the image being taken by Google, which is on the end furthest from our residence in that image) is nearly black.

HEALTH AND OTHER CONCERNS

We are rightly concerned about the release of ammonia, hydrogen sulfide, methane, and particulate matter which have definite human health risks, especially so with the close proximity to residences and water sources. We have already personally suffered an increase in headaches, nausea, stomach and digestive problems, breathing concerns, increase in allergies, stress and other health issues, and this situation has only been in place for a period of just over a year. We try to avoid doctors unless absolutely necessary and in spite of our decision to avoid a physician except in emergencies we could rightly have sought medical attention multiple times, which would further increase the economic burden on us due to this AFO. As a result of the problems we have already experienced, we are extremely concerned about long-term health issues from breathing these toxins, not to mention the stress and other issues related to mental health and well-being.

Additionally, should anyone wish to sell their residence there is a concern of a drop in property value. It is impossible for anyone to plan a summer outdoor get-together with friends or relatives, to swim in a pool (of which there are a couple, one within 130 yards and a second within 350 yards of this constant manure spreading), to garden, or even to just enjoy the day or evening with open windows and not rush to close them without warning because of the random spreading of large amounts of manure. Additionally, there are the biting flies that result and linger. How could anyone reasonably be expected to sell a house under these conditions and why would anyone purchase in this area after being subjected to the stench and pests when viewing the property?

REQUEST FOR INVESTIGATIONS AND PENALTIES FOR VIOLATIONS

In conclusion, we believe it important to have these regulations and violations looked into, hopefully to serve the AFO with a cease-and-desist order, either permanently or at least until determinations can be made, and to levy appropriate fines as soon as possible:

1). Investigate the size and scope of the AFO to determine what possible regulations are being violated, including, but not limited to, the proximity of occupied dwellings and underground streams which connect to public and/or private water sources and regularly monitor the situation.

<http://aqlaw.osu.edu/blog/tue-09302014-849am/manure-regulation-ohio>

<http://www.sustainabletable.org/906/waste-management>

http://www.ohiolivestock.org/images/1_livestock_guidelines03.pdf

<http://www.epa.ohio.gov/dsw/cafo/index>

<http://ocj.com/2014/04/handling-manure-the-right-way/> (From this article: "We deal with a set of regulations that we do not spread manure within 100 feet of an occupied residence, house well, creek or stream or any moving water...the basic tenants of the rules. ODA keeps a close eye on those things..." Sadly, the AFO operator that is the subject of this complaint does not share similar concern for neighbors as the one who is the subject of that article.)

<http://farmprogress.com/story-hb-490-passes-house-9-120536>

http://www.sswm.info/sites/default/files/reference_attachments/SUSTAINABLE%20TABLE%20ny%20Industrial%20Agriculture%20Water%20Pollution.pdf

<http://www.sraproject.org/environmental-impact-of-factory-farms/>

http://www.greenhouse.cornell.edu/crops/factsheets/nitrogen_form.pdf (see Ammonium Toxicity)

<http://www.wellwaterguide.net/nitrates-nitrites-well-water.aspx>

<http://gracelinks.org/blog/902/first-ever-court-victory-holds-cafo-accountable-for-water-po>

https://www.cdc.gov/nceh/ehs/docs/understanding_cafos_nalboh.pdf

2). Determine whether or not this AFO is violating laws by feigning a Nutrient Management Plan for an excuse to supersaturate a field in order to purposely abuse and annoy neighbors and to dispose of an abundance of animal waste that should be properly contained in a manure storage containment system.

http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs143_026138.doc

<http://articles.extension.org/pages/17212/storing-manure-on-small-farms>

3). Have the Board of Health look into this matter, also.

http://scphoh.org/ENVIRONMENTAL/ENV_PDFs/CODES/EHCodel220AnimalNuisancesRefuseStorage.pdf (See 1220.05 MANURE)

4). Oversee the AFO (ORC 3767.27) to comply with neighborhood complaints regarding nuisance ordinance (ORC 3767.13). (NOTE: There is a possibility of a class action civil suit in this regard, even if it means setting a legal precedent in the State of Ohio, similar to cases in Iowa, Missouri, etc.)

<http://codes.ohio.gov/orc/3767.27v1>

<http://codes.ohio.gov/orc/3767.13>

<http://www.motherjones.com/environment/2014/04/terrible-smell-hog-farms-lawsuits>

<http://www.prnewswire.com/news-releases/missouri-jury-awards-residents-11-million-in-damages-from-living-under-cloud-of-stench-caused-by-industrial-hog-farms-86643287.html>

5). Examine the log of the AFO regarding spreading concentrated manure and fine them for any violations. We know of several instances of this being done within 24 hours of measurable rainfall (though we cannot find historical precipitation information online for anything prior to August, 2016, but I did log two instances for August, below). This is in violation of OAC 1501:15-5-05. Additionally, there is a possibility of 3 additional violations of OAC 1501:15-5-05 for spreading after December 15, 2015.

[https://ofbf.org/app/uploads/2014/08/Summary of SB 150 as Enacted.pdf](https://ofbf.org/app/uploads/2014/08/Summary%20of%20SB%20150%20as%20Enacted.pdf)

LOG AND PHOTOS

The following are dates and times we have logged. Certainly, the AFO's log should show more than this because we certainly did not log each and every instance. If the AFO log does not indeed show more, there is a serious problem regarding their log keeping. (NOTE: Though we are not certain, this log may contain a few recent instances from spreading in the field further to the west in August of this year, the stench of which still permeated our air for an hour or more; these are noted. All times are approximate, not necessarily to the exact minute. There is approximately a three month period prior to our logging the events, and a gap between January of this year and our logging again, beginning in June. It appears the AFO is now using a quieter tractor, because we were alerted to this practice by sound a great deal of the time last year and have had to take a number of photos after the stench is already in the air because we're rarely aware of the tractor being in the field this year, though we have managed to hear and photograph it on a few occasions. The photos taken after we suffered the stench can be used to compare the unconscionable frequency and amount of this dumping.)

091715 08:00 pm
091915 08:00 am
092115 07:00 pm
092215 07:00 pm
092415 06:00 pm
092515 07:00 pm

101215 06:30 pm
101415 06:30 pm
101715 01:40 pm
102015 06:30 pm
102515 07:15 pm
102815 06:20 pm
102915 06:00 pm
103015 07:00 pm

110315 06:20 pm
110415 06:00 pm
111415 05:00 pm
111715 01:50 pm
+ 02:10 pm
112015 05:40 pm
112515 06:30 pm

120315 06:30 pm
120515 06:30 pm
120715 05:15 pm (extremely bad stench inside with windows and doors closed)
120815 12:30 pm
+ 12:40 pm
+ 01:15 pm
+ 01:30 pm
120915 06:30 pm
121115 05:50 pm
121415 06:00 pm

010116 06:30 pm (possibly in violation of OAC 1501:15-5-05)
010216 06:00 pm (possibly in violation of OAC 1501:15-5-05)
011116 07:00 pm (possibly in violation of OAC 1501:15-5-05)

<http://codes.ohio.gov/oac/1501:15-5-05v1>

060116 09:00 pm
060316 08:00 pm
061316 08:00 pm
062216 07:00 pm
062316 07:00 pm
062516 06:45 pm
062616 07:30 pm (phone call; see photos of spreading done just minutes after)

After calling to complain and instead of listening to concerns and wishing to not cause problems for the community, the AFO operator went directly to get more waste to dump, literally minutes after the call.

062716 06:00 pm (see photo)
063016 06:30 pm

07??16 ??:?? ?? (field cut for hay)

072316 12:40 pm (see photo taken an hour later)
+ 08:30 pm (see photo taken after)
072416 04:20 pm (see photo taken after)
+ 06:15 pm (see photo taken after)
072516 07:40 am (see photo taken that afternoon)
072716 07:00 am (see photo taken later that morning)
072816 07:00 am (see photo taken an hour later)
073116 07:00 am (see photo taken that afternoon)

8 TIMES in 9 DAYS. You can see the progression of the waste in the field in the photos. This is repeated sewage disposal, over an underground stream that eventually flows into the Kokosing River and may not be 100 feet under the surface, some spreading likely within 100 feet of an occupied residence (whose occupants were outdoors entertaining guests last summer when manure was spread within 50 feet of them) and possibly private wells.

And although we didn't get photos each time and may have missed logging each instance, this sewage disposal has continued, unabated, in August. You can see that the AFO targets the corner adjacent to our property, possibly as a "revenge" tactic for a complaint we did not, nor did our next-door neighbors, make in 2015.

080516 08:45 am (see photo)
080616 09:00 pm (stench less malodorous; possibly from the field further west)
080716 09:00 pm (stench less malodorous; possibly from the field further west)
080816 07:20 am
+ 08:15 pm (see photo taken next day)
081116 04:30 pm (see photo)
081216 09:00 pm (stench less malodorous; possibly from the field further west)
081316 09:00 pm *over 1" of rain over next 24 hours (OAC 1501:15-5-05 violation)
081616 06:00 pm *1/2" of rain over next 24 hours (OAC 1501:15-5-05 violation)
082516 08:00 am
+ 07:00 pm
082616 08:00 pm (stench less malodorous; possibly from the field further west)
082716 08:15 am (stench less malodorous; possibly from the field further west)
+ 03:30 pm (field cut for hay; see photo)
082816 08:00 am (stench less malodorous; possibly from the field further west)
082916 07:00 am (stench less malodorous; possibly from the field further west)
+ 07:00 pm (see photo, stench less malodorous began after tractor in field)
083016 07:00 am (stench less malodorous; possibly from the field further west)
+ 12:00 pm (hay bail collection, see photo)
+ 04:00 pm (stench less malodorous; possibly from the field further west)
083116 06:45 pm (see photo, stench less malodorous began after tractor in field)

090116-090316 (see photo, immediately after removing bails, manure dump underway)

additional photos:

080916 03:00 pm (photos showing supersaturation, manure clearly visible on grass)

CONCLUSION

Please keep us informed of any action with regard to this AFO.

When possible, we will continue to monitor, photograph and log this practice for legal purposes, assisting the government in finding violations of law and possibly pursuing civil suits.

<http://modernfarmer.com/2014/01/stink-wars-foul-wind-wafts-farm-problem/>

NOTE: If you have received this via US Postal Service rather than via email, all of the photos (including Google Earth image) can be found on this link (which can be typed into your browser URL):

<http://s345.photobucket.com/user/missmeowness/library/spray-1>

Sincerely,

Exemption 6, Exemption 6

Exemption 6

Mount Vernon, OH 43050

This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it...